

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

In re:

CHARLES J. SMITH

Debtor(s).

CASE NO. 21-20986-dob
HON. DANIEL S. OPPERMAN
CHAPTER 13 PROCEED

DEBTOR(S) RESPONSE TO TRUSTEE'S MOTION TO DISMISS

Debtor(s), by counsel, respond to Nationwide Judgment Recovery, Inc.'s (hereinafter "Nationwide"), Motion to Dismiss as follows:

1. Admit.
2. Admit.
3. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
4. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
5. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
6. Neither admit nor deny.
7. No response necessary.
8. Neither admit nor deny.
9. Neither admit nor deny but leave the Nationwide to their proofs.
10. No response necessary.
11. No response necessary.
12. No response necessary.

13. No response necessary.
14. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
15. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
16. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
17. Neither admit nor deny but leave the Nationwide to their proofs.
18. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
19. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
20. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
21. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
22. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
23. Neither admit nor deny for the reason that the allegation sets forth a conclusion of law and therefore no answer is required.
24. No response necessary.

WHEREFORE, Debtor(s)' request that Nationwide's motion be denied and the order attached as Exhibit 1 be entered.

Respectfully submitted,

Date: November 29, 2021

/s/Michael J. Shovan
Michael J. Shovan
Attorney for Debtor(s)
6620 Weiss Street
Saginaw MI 48603
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P43362

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

In re:

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CASE NO. 21-20986-dob
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Debtor(s).

ORDER DENYING TRUSTEE'S MOTION TO DISMISS

After a hearing on the matter and this Court being advised,

IT IS ORDERED:

Nationwide Judgment Recovery, Inc.'s Motion to Dismiss is DENIED.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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CERTIFICATE OF SERVICE

On the date set forth below, the undersigned served DEBTOR(S) RESPONSE TO NATIONWIDE JUDGMENT RECOVERY, INC.'S MOTION TO DISMISS & PROPOSED ORDER electronically through the CM/ECF system on all participants and/or by first class mail on all interested parties including the Debtor(s) at their address of record.

Respectfully submitted,

Date: November 29, 2021

/s/Michael J. Shovan
Michael J. Shovan
Attorney for Debtor(s)
6620 Weiss Street
Saginaw MI 48603
(989) 847-6030
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